

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GIANNI VERSACE, S.p.A.,)	
)	Case No. 18-cv-01173
Plaintiff,)	
)	Judge Virginia M. Kendall
v.)	
)	Magistrate Judge Michael T. Mason
ZHAO DEQUN, et al.,)	
)	
Defendants.)	
)	

**PLAINTIFF’S *EX PARTE* MOTION FOR ENTRY OF A TEMPORARY
RESTRAINING ORDER, INCLUDING A TEMPORARY INJUNCTION,
A TEMPORARY TRANSFER OF THE DEFENDANT DOMAIN NAMES,
A TEMPORARY ASSET RESTRAINT, AND EXPEDITED DISCOVERY**

Plaintiff Gianni Versace, S.p.A. (“Versace” or “Plaintiff”) seeks entry of an *ex parte* temporary restraining order, including a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of counterfeit Versace products, a temporary transfer of the Defendant Domain Names, a temporary asset restraint, and expedited discovery in an action arising out of 15 U.S.C. § 1114; Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); and the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, *et seq.* A Memorandum of Law in Support is filed concurrently with this Motion.

Dated this 16th day of February 2018.

Respectfully submitted,

/s/ Justin R. Gaudio

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